

**BAILEY ♦ KENNEDY**  
8984 SPANISH RIDGE AVENUE  
LAS VEGAS, NEVADA 89148-1302  
702.562.8820

DENNIS L. KENNEDY  
Nevada Bar No. 1462  
JOSHUA M. DICKEY  
Nevada Bar No. 6621  
PAUL C. WILLIAMS  
Nevada Bar No. 12524  
AMANDA L. STEVENS  
Nevada Bar No. 13966  
**BAILEY ♦ KENNEDY**  
8984 Spanish Ridge Avenue  
Las Vegas, Nevada 89148-1302  
Telephone: 702.562.8820  
Facsimile: 702.562.8821  
DKennedy@BaileyKennedy.com  
JDickey@BaileyKennedy.com  
PWilliams@BaileyKennedy.com  
AStevens@BaileyKennedy.com

[Additional Attorneys on Signature Page]

*Attorneys for Plaintiff Crystal Torno*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CRYSTAL TORNO (a.k.a. CRYSTAL A.  
THOMAS-BOLDUC), an individual,

Plaintiff,

vs.

GREEN TREE SERVICING, LLC;  
NATIONAL DEFAULT SERVICING  
CORPORATION; and PREMIER AMERICAN  
TITLE AGENCY, INC., FANNIE MAE; and  
DOES 1-10, inclusive,

Defendants.

Case No. 2:15-cv-01018-APG-PAL

**STIPULATION AND ORDER:**

- 1. EXTENDING TIME FOR DEFENDANT  
GREEN TREE SERVICING, LLC TO  
PROVIDE COMPELLED DOCUMENTS [ECF  
No. 69];**
- 2. EXTENDING TIME FOR PLAINTIFF  
CRYSTAL TORNO TO FILE HER RESPONSE  
TO MOTION TO STRIKE [ECF Nos. 70, 71]**
- 3. TO RESCHEDULE STATUS CHECK [ECF  
No. 69]**

**(FIRST REQUEST)**

Pursuant to Local Rule IA 6-1, Plaintiff Crystal Torno (“Ms. Torno”), Defendant Green Tree Servicing, LLC (“Green Tree”), Defendant Federal National Mortgage Association (“Fannie Mae”), and Defendant National Default Servicing Corporation (“National Default”) (collectively, the “Parties”) hereby stipulate and agree as follows:

1           1.       On July 28, 2016, the Court (Magistrate Judge Peggy A. Leen) granted Ms. Torno's  
 2 Motion to Compel (ECF No. 38) in part, compelling Green Tree to respond to Ms. Torno's Requests  
 3 for Production Nos. 12, 13 and 14 with respect to Ms. Torno's own loan file and requiring Green  
 4 Tree to produce fifty (50) "random loan files available in which Green Tree was the servicer of the  
 5 note, executed the affidavit of authority, and attached the [affidavit of authority] identifying Green  
 6 Tree as the beneficiary," (the "Compelled Documents"). (ECF No. 69.)

7           2.       The Court ordered Green Tree to produce the Compelled Documents within thirty  
 8 (30) days of the Court's Order—by August 29, 2016.<sup>1</sup>

9           3.       The Court also set a Status Conference for October 18, 2016, at 9:00 a.m.

10          4.       On August 22, 2016, the Parties agreed to a random sampling methodology to  
 11 identify the fifty (50) random loan files.

12          5.       Subsequently, the Parties informally agreed to extend Green Tree's deadline to  
 13 provide the Compelled Documents to September 16, 2016.

14          6.       On September 15, 2016, Defendants Green Tree and Fannie Mae filed a Motion to  
 15 Strike Class Allegations (the "Motion to Strike"). (ECF No. 70.)

16          7.       On September 16, 2016, National Default joined in the Motion to Strike. (ECF No.  
 17 71.)

18          8.       Subsequently, Green Tree again requested the deadline to provide the Compelled  
 19 Documents.

20          9.       Accordingly, the Parties hereby stipulate to:  
 21           a.       Extend the deadline for Green Tree to produce the Compelled Documents to  
 22               September 30, 2016;  
 23           b.       Extend Ms. Torno's deadline to file a response to the Motion to Strike from  
 24               October 2, 2016 to October 21, 2016; and  
 25

26  
 27 <sup>1</sup> Thirty (30) days after the Court's Order fell on August 27, 2016, a Saturday. Accordingly,  
 28 the deadline was moved to the next judicial day, August 29, 2016. *See* Fed. R. Civ. P. 6(a)(1)(c).

c. Reschedule the status conference set for October 18, 2016, at 9:00 a.m. to a date and time in or around November 2016.

10. The reason for this request is to provide Green Tree more time to produce the Compelled Documents, and to provide Ms. Torno more time in which to review the Compelled Documents and respond to the Motion to Strike.

DATED this 26<sup>th</sup> day of September, 2016.

TIFFANY & BOSCO, P.A.

By: /s/ Kevin Soderstrom

GREGORY L. WILDE, BAR NO. 4417  
KEVIN SODERSTROM, BAR NO. 10035  
MATTHEW D. DAYTON, BAR NO. 11552  
212 South Jones Blvd.  
Las Vegas, NV 89107  
Phone: (702) 258-8200  
Facsimile: (702) 258-8787  
efilenv@tblaw.com  
kss@tblaw.com  
md@tblaw.com

*Attorneys for Defendant National Default  
Servicing Corporation*

DATED this 26<sup>th</sup> day of September, 2016.

GREENBERG TRAURIG, LLP

By: /s/ Michael R. Hogue

MARK E. FERRARIO, BAR NO. 1625  
JACOB D. BUNDICK, BAR NO. 9772  
MICHAEL R. HOGUE, BAR NO. 12400  
JENNIFER L. GRAY, ESQ. (*Admitted Pro Hac Vice*)  
3773 Howard Hughes Parkway  
Suite 400 North  
Las Vegas, NV 89169  
Phone: (702) 792-3773  
Facsimile: (702) 792-9002  
ferrariom@gtlaw.com  
bundickj@gtlaw.com  
grayjen@gtlaw.com

*Attorneys for Defendants Green Tree Servicing,  
LLC and Federal National Mortgage  
Association*

DATED this 26<sup>th</sup> day of September, 2016.

BAILEY ♦ KENNEDY

By: /s/ Paul C. Williams

DENNIS L. KENNEDY  
JOSHUA M. DICKEY  
PAUL C. WILLIAMS  
AMANDA L. STEVENS

GEORGE H. HAINES  
DAVID H. KRIEGER  
HAINES & KRIEGER  
8985 South Eastern Avenue, Suite 130  
Las Vegas, Nevada 89123  
Phone: (702) 880-5554  
Fax: (702) 385-5518  
GHaines@hainesandkrieger.com  
DKrieger@hainesandkrieger.com

*Attorneys for Plaintiff Crystal Torno*

BAILEY ♦ KENNEDY  
8984 SPANISH RIDGE AVENUE  
LAS VEGAS, NEVADA 89148-1302  
702.562.8820

**ORDER**

IT IS SO ORDERED:

Green Tree's deadline to provide the Compelled Documents is hereby extended to September 30, 2016. Ms. Torno's deadline to file a response to the Motion to Strike is hereby extended from October 2, 2016 to October 21, 2016.

The status conference set for October 18, 2016, 9:00 a.m. is hereby RESET to November 17, 2016, at 10:00 a.m., in LV Courtroom 3B before Magistrate Judge Peggy A. Leen.

  
UNITED STATES MAGISTRATE JUDGE

Dated: September 28, 2016

Respectfully Submitted by:

BAILEY ♦ KENNEDY

By: /s/ Paul C. Williams

DENNIS L. KENNEDY  
JOSHUA M. DICKEY  
PAUL C. WILLIAMS  
AMANDA L. STEVENS

HAINES & KRIEGER  
GEORGE H. HAINES  
DAVID H. KRIEGER

*Attorneys for Plaintiff Crystal Torno*